

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

KASHYAP “KASH” PATEL

Plaintiff,

V.

POLITICO, LLC et al

Defendants.

Case 3:19-cv-879-MHL

MOTION TO REMAND CASE TO STATE COURT

Plaintiff, Kashyap “Kash” Patel, by counsel, pursuant to 28 U.S.C. § 1447(c) and Rules 7(b) and 81(c) of the Federal Rules of Civil Procedure and Local Civil Rule 7, hereby moves the Court to remand this action to the Circuit Court for the County of Henrico, Virginia.

The arguments and legal bases for Plaintiff's Motion to Remand are stated more fully in a Memorandum in Support of Motion for Remand to State Court, being filed contemporaneously with this Motion.

WHEREFORE, Plaintiff, Kashyap “Kash” Patel, respectfully requests the Court to grant this Motion and remand this action to State Court. In accordance with § 1447(c), Plaintiff requests attorney’s fees in the sum of \$950 (2 hours @ \$475/hr) incurred as a result of the removal.

DATED: November 27, 2019

KASHYAP “KASH” PATEL

By: /s/Steven S. Biss

Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2019 a copy of the foregoing was filed electronically using the Court’s CM/ECF system, which will send notice of electronic filing to counsel for the Defendants and any/all other interested parties receiving notices via CM/ECF.

By: /s/Steven S. Biss

Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiff